

**REMARKS**

Claims 1-4, 6, 7 and 11-17 have been examined on their merits, and are all the claims presently pending in the application.

1. Claims 1-4, 6, 7 and 11-19 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Beser *et al.* (U.S. Patent No. 6,496,867). Applicants traverse the § 102(e) rejection of claims 1-4, 6, 7 and 11-19 for at least the reasons discussed below.

Beser *et al.* fail to teach or suggest at least the communication mean's lack of knowledge of the fixed IP addresses of hosts from which messages are sent, or the use of dynamic IP addresses to conceal fixed IP addresses, as recited in amended claim 1. As cited by the Patent Office, at col. 21, lines 38-62, Beser *et al.* disclose:

Following the above methods, the first network device 14 has the following network addresses: the public network address of the second network device 16, and the private network addresses assigned to the originating 24 and terminating 26 ends of the tunneling association. Similarly, the second network device 16 has the following network addresses: the public network address of the first network device 14, and the private network addresses assigned to the originating 24 and terminating 26 ends of the tunneling association.

The assignment of private network addresses to the ends of the tunneling association may also include transmitting the private network addresses to the network devices at the ends of the tunneling association where the private network addresses are stored on these end devices. For example, the originating network device 24 may store the private network addresses for the originating and terminating ends of the tunneling association on the originating network device 24. In this manner, any packet sent from the originating network device 24 to the first network device 14 may include the private network addresses of the originating and terminating ends of the tunneling association. Similarly, any packet sent from the terminating network device 26 to the second network device

16 may include the private network addresses of the originating and terminating ends of the tunneling association.

Contrary to amended claim 1 of the instant application, the network devices (14, 16) of Beser *et al.* have knowledge of the private fixed IP addresses of the originating device (24) and the terminating device (26), and these addresses are included in the message traffic. It is immaterial that the network devices (14, 16) do not reveal the private fixed IP addresses, since Beser *et al.* clearly disclose that the network devices need to know the private fixed IP addresses of the originating and terminating devices, which is contrary to the method recited in amended claim 1. Furthermore, the fixed IP address in a packet is not replaced with a dynamic IP address, as recited in amended claim 1. Instead, the first network device (14) of Beser *et al.* examines the entry in its network address table that contains the private network address for the terminating network device (26), and knows where to route the packet by translating the private network address for the terminating network device (26) to the public network address for the second network device (16). There is no teaching or suggestion that the public network address for the second network device (16) is dynamic as understood by one of ordinary skill in the art.

Based on at least the foregoing reasons, Applicants submit that claim 1 is in condition for allowance over Beser *et al.*, and further submit that claims 2-4, 6, 7 and 18 are allowable as well, at least by virtue of their dependency from claim 1. Applicants respectfully request that the Patent Office reconsider and withdraw the § 102(e) rejection of claims 1-4, 6, 7 and 18.

With respect to amended independent claim 11, Applicants submit that claim 11 is in condition for allowance over Beser *et al.* for at least reasons analogous to those discussed above

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. APPLICATION NO. 09/939,691  
ATTORNEY DOCKET NO. Q65842

with respect to claim 1, and respectfully request that the Patent Office reconsider and withdraw the § 102(e) rejection of claim 11.

With respect to amended independent claim 12, Applicants submit that claim 12 is in condition for allowance over Beser *et al.* for at least reasons analogous to those discussed above with respect to claim 1, and further submit that claims 13-17 and 19 are allowable as well, at least by virtue of their dependency from claim 12. Applicants request that the Patent Office reconsider and withdraw the § 102(e) rejection of claims 12-17 and 19.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: October 28, 2005

Respectfully submitted,



Paul J. Wilson  
Registration No. 45,879